JAN 1 . 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. **Maria del Rocio FLORES-Huerta,** Defendant	Magistrate Case No. 08MJ0113 COMPLAINT FOR VIOLATION OF: Title 31 U.S.C., Sec. 5332(a) Bulk Cash Smuggling

The undersigned complainant, being duly sworn, states:

On or about January 13, 2008, within the Southern District of California, defendant María del Rocío FLORES-Huerta, with the intent to evade the currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly and intentionally conceal more than $10,000.00 in United States currency, to wit, a total of approximately $241,240.00, concealed in a vehicle, and attempt to transport or transfer such currency from a place within the United States to a place outside of the United States; in violation of Title 31, United States Code, Section 5332(a).

And the complainant further states that this complaint is based on the attached Probable Cause Statement, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
Moises Martinez
US Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **15th** DAY OF **January 2008**

Nita L. Stormes
UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

On January 13, 2008, at approximately 2:45 p.m., Customs and Border Protection (CBP) Officer Dario Flores was conducting an Anti-Terrorist and Contraband Enforcement Team (AT-CET) southbound operation at the San Ysidro, California, Port of Entry when a black 2007 Chevy Avalanche with California plate number 8J46203 approached his lane. Officer Flores approached the driver and asked for identification to which Maria del Rocio FLORES presented a California driver's license. Officer Flores asked FLORES where she was going to which FLORES responded that she was going to visit her mother. Officer Flores asked FLORES if she was taking anything to Mexico to which FLORES responded she was not and Officer Flores asked FLORES if she was taking more than $10,000 to which she stated she was not. Officer Flores asked FLORES a third time if she was taking anything to Mexico to which she again stated she was not.

Officer Flores escorted the vehicle to the west secondary area for an x-ray operation. As Officer Flores escorted FLORES and her three children, FLORES stated that the vehicle belonged to a friend and that her vehicle had broken down. FLORES also stated that she has been unemployed for the last four months. After the x-ray examination, Officer Flores conducted a seven-point inspection of the vehicle and discovered that a piece of a corner of the floor of the truck had been cut out. Officer Flores stuck a screwdriver through the opening and felt that it had hit something. Officer Flores then used his flashlight and saw a package wrapped in beige masking tape. Officer Flores removed fifteen packages from the compartment of the truck, probed a random package revealing currency and counted the currency amounting to $241,240.00.

In the post Miranda statement given by Maria del Rocio FLORES to special agents in the Spanish language, FLORES admitted that she had been told she would be smuggling money out of the country and was to be paid $300. FLORES also admitted that this was her second time smuggle money out of the country and that she received $300 for her first successful smuggling venture.

Executed on 1-15-08 (date) at 3:00 pm (time)

Special Agent